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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

HDMI LICENSING ADMINISTRATOR, INC.,

Plaintiff and Counterclaim De-  
fendant,

v.

AVAILINK INC.,

Defendant and Counterclaimant.

Case No. 5:22-cv-6947-EKL

**DECLARATION OF SEAN P. GATES IN  
SUPPORT OF AVAILINK'S MOTION TO  
EXCLUDE EXPERT TESTIMONY OF LAW  
PROFESSOR JORGE L. CONTRERAS**

Hearing Date: October 15, 2025  
Time: 10:00 a.m.  
Place: Courtroom 7, Fourth Floor  
Judge: Hon. Eumi K. Lee

1 I, Sean P. Gates, declare as follows:

2 1. I am a member of the bar of the State of California and a partner at the law firm Illovsky  
3 Gates & Calia LLP, counsel of record for Defendant and Counterclaimant Availink Inc. (“Availink”) in  
4 the above-captioned proceeding. I make this declaration based on my personal knowledge and, if called  
5 upon to do so, could and would testify competently thereto.

6 2. I submit this declaration in support of Availink’s Notice of Motion and Motion to Exclude  
7 Expert Testimony of Law Professor Jorge L. Contreras.

8 3. Attached hereto as **Exhibit 1** is a true and correct copy of Professor Jorge L. Contreras’s  
9 Opening Expert Report dated May 2, 2025;

10 4. Attached hereto as **Exhibit 2** is a true and correct copy of Professor Jorge L. Contreras’s  
11 Rebuttal Expert Report dated May 23, 2025; and

12 5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the deposition  
13 transcript of Jorge L. Contreras taken on June 9, 2025.

14 I declare under penalty of perjury of the laws of the United States that the foregoing is true and  
15 correct.

16 Executed on August 15, 2025, in Glendale, California.

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18 /s/ Sean P. Gates  
Sean P. Gates  
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